

SAUL EWING

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December 23, 2024

The Honorable Robyn F. Tarnofsky
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

RE: Zaziiz S. L. Dinkins v. Alejandro Mayorkas
1:23-cv-10660-RFT

Application GRANTED. The Clerk of Court is respectfully requested to terminate ECF 102.

Dated: December 23, 2024
New York, New York

SO ORDERED

ROBYN F. TARNOFSKY
UNITED STATES MAGISTRATE JUDGE

Dear Judge Tarnofsky:

As Your Honor is aware, we represent Plaintiff Zaziiz S. L. Dinkins (“Plaintiff”) as *pro bono* counsel for the limited purpose of conducting a Settlement Conference in the above-referenced matter. On December 3, 2024, we, along with counsel for Defendant Alejandro Mayorkas, United States Secretary of Homeland Security (“Defendant”), wrote to advise the Court that the parties had reached a settlement in principle to resolve this action in its entirety and to request a general stay to permit the parties to memorialize their agreement and file it on the docket by December 23, 2024. ECF Nos. 100, 101. On December 17, 2024, counsel for Plaintiff received an initial proposed settlement agreement, and on December 20, 2024, counsel for Plaintiff received a revised proposed settlement agreement from Defendant’s counsel. To permit Plaintiff’s counsel sufficient time to review the proposed settlement agreement and to work out any issues with Defendant’s counsel, the parties jointly ask that the Court entertain another brief stay through Friday January 3, 2025 so that the parties can execute their settlement agreement and file it on the docket.

We appreciate the Court’s attention to this matter.

Sincerely,

/s/Ryan M. Jerome

Ryan M. Jerome

cc: All Counsel Of Record Via ECF